

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

| | | |
|--------------------------------------|---|-------------------------|
| In re: | : | |
| Theresa Kepple | : | Case No. 16-24304CMB |
| | : | Chapter 13 |
| Debtor(s) | : | |
| Specialized Loan Servicing LLC, as | : | |
| Servicer for Wilmington Savings Fund | : | |
| Society, FSB, DBA Christian Trust, | : | |
| Not in its individual capacity, but | : | |
| Solely in its capacity as Owner | : | |
| Trustee for WF 19 Grantor Trust, its | : | |
| Successors and/or assign | : | |
| | : | Related to Document #68 |
| Movant(s) | : | |
| | : | |
| vs. | : | |
| Theresa Kepple, Robert D. Kepple Sr. | : | |
| And Ronda J. Winnecour, Trustee | : | Hearing Date 6/20/18 |
| Respondent(s) | : | |

TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM THE AUTOMATIC
STAY AND CO-DEBTOR STAY

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,
respectfully represents the following:

1. The Motion pertains to 229 Moran Rd, Butler, PA 16002. The Motion pleads a total collateral value of \$150,000 and a balance due the Movant of \$9,639. The property is subject to another mortgage of U.S. Bank, N.A., c/o Ditech Financial LLC, in amount of \$76,877.56 and an exemption claimed of \$23,675. It appears that based on a value of \$150,000 there is equity in the property above the mortgages and claimed exemption. The Trustee understands the Debtor to be seeking a reverse mortgage to pay off U.S. Bank (and assumes that the Movant will also be addressed as part of any such the financing). Alternatively, the Trustee assumes that if a reverse mortgage is not feasible, then this property (or the other property located at 228 Moran Street) will need to be

sold to facilitate plan funding.¹

2. Regardless of the final form of the Plan, based on the apparent equity in the property, it appears that the Movant is adequately protected by an equity cushion and there is insufficient cause to grant relief from stay at the present time.

WHEREFORE, the Trustee respectfully requests that the Motion be denied or deferred at the present time.

RONDA J. WINNECOUR,
CHAPTER 13 TRUSTEE

Date: 4/30/18

by /s/ Owen W. Katz
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¹ The Motion identifies two mortgages by U.S. Bank. It appears that the second U.S. Bank mortgage, in the filed amount of \$37,653.24, is against the 228 Moran Road property.

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| And Ronda J. Winnecour, Trustee | : | Hearing Date 6/20/18 |
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CERTIFICATE OF SERVICE

I hereby certify that on the 30th of April 2018, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire
Assistant U.S. Trustee
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Pittsburgh PA. 15222

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/s/Dianne DeFoor
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